

Steven G. Storch (SS 5241)  
Rena Andoh (RA 9376)  
Brittany Nilson (BN 4949)  
STORCH AMINI & MUNVES PC  
Two Grand Central Tower, 25<sup>th</sup> Floor  
140 East 45<sup>th</sup> Street  
New York, New York 10017  
Tel. (212) 490-4100  
Fax (212) 490-4208  
[storch@samlegal.com](mailto:storch@samlegal.com)  
[rando@samlegal.com](mailto:rando@samlegal.com)  
[bnilson@samlegal.com](mailto:bnilson@samlegal.com)

*Attorneys for PJ Administrator LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION CORPORATION, x  
Plaintiff, : No. 08-01789 (BRL)  
v. : SIPA Liquidation  
: (Substantively Consolidated)  
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BERNARD L. MADOFF INVESTMENT :  
SECURITIES LLC, :  
Defendant. :  
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In re: x  
BERNARD L. MADOFF, :  
Debtor. :  
----- x

**OBJECTION TO TRUSTEE'S PRODUCTION OF PJ's  
POTENTIALLY CONFIDENTIAL DOCUMENTS**

PJ Administrator LLC ("PJ"), by and through its undersigned counsel, hereby objects to the Trustee's letter providing notice of intent to produce documents potentially containing PJ's confidential information, annexed hereto as Exhibit A.

Initially, PJ objects on the grounds that the documents the Trustee seeks to produce may contain information that has been designated confidential. PJ cannot properly evaluate whether the documents the Trustee seeks to produce are in fact confidential, and whether a protective order is warranted, because the Trustee has failed to inform PJ which documents it seeks to produce.

The Trustee 's failure to identify documents the Trustee believes are responsive to this request denies PJ the opportunity to evaluate the appropriateness of production of in accordance with Paragraph 12 of the Litigation Protective Order entered on June 6, 2011 [Docket No. 4137].

WHEREFORE, PJ objects to the Trustee's production of potentially confidential and irrelevant information without first providing the document request to PJ and identifying which documents the Trustee seeks to produce.

Dated: New York, New York  
October 12, 2011

STORCH AMINI & MUNVES PC

By: /s/ Steven G. Storch  
Steven G. Storch (SS 5241)  
Rena Andoh (RA 9376)  
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140 East 45<sup>th</sup> Street  
New York, New York 10017  
(212) 490-4100  
*Attorneys for PJ Administrator LLC*